



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 8, 2017

Mr. Jon Wood
Senior Regulatory Manager
AMVAC Chemical Corporation
4695 MacArthur Court, Suite 1200
Newport Beach, CA 92660

Subject: Label Amendment – Additional Directions for Use, clip to hold pest strip
Product Name: Alco Small Pest Strip
EPA Registration Number: 5481-348
Application Date: January 16, 2017
Decision Number: 526187

Dear Mr. Wood:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Carlyn Petrella by phone at 703-347-0439, or via email at petrella.carlyn@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Gebken', written in a cursive style.

Richard Gebken
Product Manager 10
Invertebrate & Vertebrate Branch 2
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

ALCO SMALL PEST STRIP

ACTIVE INGREDIENT:

Dichlorvos (2,2-dichlorovinyl dimethyl phosphate).....18.6%
 Related Compounds.....1.4%

INERT INGREDIENTS:.....80.0%

Total 100.0%

This product contains the toxic inert ingredient Bis (2-ethylhexyl) adipate (DEHA) at 19.8%.

**KEEP OUT OF REACH OF CHILDREN
 WARNING**

See Back (Side) Panel for Additional Precautionary Statements and Directions for Use

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage. POISONING SYMPTOMS: CONTAINS AN ORGANOPHOSPHATE THAT INHIBITS CHOLINESTERASE. Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pin point pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps. TREATMENT: Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, atropine sulfate should be injected at 10 minute intervals in doses of 1 to 2 milligrams until complete atropinization has occurred. Morphine is contraindicated. 2-PAM is also antidotal and may be administered in conjunction with atropine. Clear chest by postural drainage.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:	
For Medical Emergencies phone:.....1-888-681-4261	
For Transportation Emergencies, including spill, leak or fire, phone: CHEMTREC®.....1-800-424-9300	
For Product Use Information phone: AMVAC®.....1-888-462-6822	

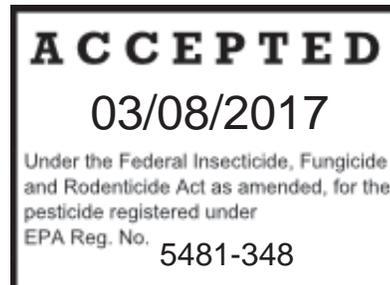
EPA Reg. No. 5481-348

EPA Est. No. _____

Net Weight: _____ {**NOTE TO REVIEWER:** The small pest strip will only be sold in the sizes 5.25 g (0.9 oz.), 10.5 g (0.37 oz.) and 16 g (0.56 oz.)}



4100 East Washington Boulevard Los Angeles, California 90023 U.S.A.
 1-888-462-6822



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed. Do not get in mouth. Harmful if inhaled. Causes moderate eye irritation. Avoid breathing vapors. Avoid contact with eyes of clothing. After prolonged storage, a small amount of liquid may form on strip. Do not get liquid in eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Do not use in hospitals or clinic rooms, such as patient rooms, wards, nurseries, operating or emergency areas. If used within homes, use only in closets, wardrobes and cupboards, but do not use in closets and wardrobes of rooms where infants, children and the sick or aged are or will be present for any extended period of confinement. Do not use in any area of the home where people will be present for extended periods of time. {NOTE TO REVIEWER: One of the following two sentences will be used on the label} Do not use in kitchens. –OR- Do not use in kitchens, except cupboards. Do not use in the food/feed area of restaurants or any area where food is prepared or served. Not to be taken internally by humans or animals.

{NOTE TO REVIEWER: The following are optional marketing claims.}

- Pest (strip) (unit) (bar)
 - (What it does:) Kills flying and crawling (insects) (insect pests) as listed
 - Long-lasting ('Round –the-clock') protection
 - (Solid strip formula) kills (flies) (moths) (mosquitoes) (gnats) (cockroaches) (silverfish) (spiders) (spider mites) (and) (other insects as listed)
 - (Also) For use in (homes, only in cupboards, closets and wardrobes) (storage units) (garages) (attics) (crawl spaces) (boathouses) (museum collections) (garbage cans) (trash dumpsters) (mobile garbage bins) (trash bins) (animal buildings) (milk rooms) (catch basins) (bulk raw grain bins) (storage bins) (enclosed utility boxes) (reptile houses) (and) (terrariums)
 - Where to use: garbage rooms, lavatories, floor drains (to sewer) entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, utility equipment, garages, mop closets, and product storage, after canning or bottling.
 - For (household) (commercial) (and) (industrial) use(s)
 - A (clothes) moth killer
 - Use as a moth killer
 - (A) small space insect killer
 - (A) small space bug killer
 - A fly killer
 - Use as a fly killer
 - (Controlled) (Continuous) (slow) release (technology) (action)
 - Sustained release (technology)
 - Convenient
 - Ready to use
 - Simply remove from package to begin controlling action
 - Unscented
 - No unpleasant odor
 - (Clean) (odorless) (deep) penetrating vapor (action)
 - No -mess vapor technology
 - Leaves no (mess) (residue) (odor)
 - Non-staining
 - 2-pack
 - Easy-to-use mounting clip included
 - Will not damage natural or synthetic materials
 - One unit (treats) (will treat) up to ____ cu. ft. {NOTE TO REVIEWER: The blank will be filled in with 200 for 16 g strips, 100 for 10.5 g strips or 50 for 5.25 g strips.}
 - (Keeps protecting) (Keeps insects out) (Works) (Continuous protection) (Continuous insect protection) (Keeps killing) (Lasts) (Kills) for up to 4 months
 - Long term (enclosed) space protection
 - Just (hang) (or) (stand up) in (garages) (sheds) (attics) (homes, only for use in cupboards, closets and wardrobes) (storage units) and (more*) (others*)
- *See back for details

- **How it works:** The Alco Small Pest Strip utilizes controlled release technology to slowly diffuse a deep penetrating vapor in enclosed spaces for up to 4 months. The clean, odorless vapor is evenly distributed throughout the enclosed treatment area, killing visible and hidden insects on contact and preventing new insect infestations (while you're away).

PRODUCT FACTS	
<p>What It Does: Kills Flying and Crawling Insects including: Flies, Gnats, Mosquitoes, Moths, Silverfish, Cockroaches, Spiders, Beetles, Earwigs, Spider Mites and other listed insects.</p>	<p>Where to Use: Garages, Storage Units, Enclosed Crawl Spaces, Closets, Wardrobes, and Cupboards</p> <p>Questions & Comments: Call [<i>telephone number</i>] or visit our website at [<i>web address</i>]</p>

**STOP! READ ENTIRE LABEL BEFORE USE.
DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

RESTRICTIONS:

- Do not use in the food/feed areas of food/feed processing or food/feed manufacturing or food/feed service establishments. Non-food/feed areas of these establishments where the product can be used are areas such as garbage rooms, lavatories, floor drains (to sewer) entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, utility equipment, garages, mop closets, and product storage (after canning or bottling).
- If product is used within homes, use only in closets, wardrobes and cupboards.
- Do not use in areas where people will be for an extended period of time.
- Do not allow children to handle new or used strips.

DIRECTIONS:

This product (or product brand name) controls (flies) (gnats) (mosquitoes) (moths) (silverfish) (cockroaches) (spiders) (beetles) (earwigs) (spider mites) (and) (other insects as listed). This product (or product brand name) may be used in (homes, only in cupboards, closets and wardrobes) (storage units) (garages) (attics) (crawl spaces) (boathouses) (museum collections) (garbage cans) (trash dumpsters) (trash bins) (mobile garbage bins) (animal buildings) (milk rooms) (catch basins) (bulk raw grain bins) (storage bins) (enclosed utility boxes) (reptile houses) (terrariums) (and) (non-food/feed areas of food/feed processing or food/feed manufacturing or food/feed service establishments).

Remove pre-assembled pest strip (or product brand name) from the sealed bag when ready to use. Do not allow children to handle new or used strips. (Place) (Hang) in the desired location away from windows and out of the reach of children and pets. (To apply strips to vertical surfaces, use the enclosed stickers.) Drafts, weather and other conditions may affect the performance, but treatment usually lasts for four (or 4) months. Record the date of installation and replace with a (new) (fresh) (full-strength) strip at the end of four (or 4) months or when effectiveness diminishes.

Always use the appropriate size and number of strips for the space being treated. One [16 or 10.5 or 5.25] g strip will treat [200 or 100 or 50] cu. ft. If more than one strip is needed for the space being treated, space strips evenly throughout the treatment area.

{*NOTE TO REVIEWER:* One or more of the site-specific directions for use below will appear on the product label.}

(WHERE TO USE:)

(FOR USE IN THE FOLLOWING:)

In Homes:

This product may only be used in cupboards, closets and wardrobes within the home. This product gives continuous protection against moths, silverfish, cockroaches and other insects as listed and leaves no smell (or odor). Strip may be hung from or stood on a rail within the closet or wardrobe. Ensure that strip will not contact clothes or fabric and ensure that air can circulate around the strip. Keep the treated space closed. Do NOT use more than the number of strips recommended for the space to be treated. Do NOT use in closets and wardrobes of rooms where infants, children and the sick or aged are or will be present for any extended period of confinement. Do NOT use where

unwrapped food is stored or allow the strip to come into contact with food or cooking utensils. Do NOT allow children or pets to play or sleep in these areas when treatment is in progress. Do NOT allow children to handle new or used strips. Do NOT use in areas where people will be for an extended period of time (e.g., Living Room, Family Room).

In (Garages) (Storage Units) (Storage Bins) (Attics) (Crawl Spaces) (Boathouses) (and) (Non-food/feed areas of food/feed processing or food/feed manufacturing or food/feed service establishments):

This product controls flies, mosquitoes, gnats and other insects as listed (for up to 4 months). Do NOT use in areas where people will be for an extended period of time. Place the product in an open space of an enclosed area, away from windows. Calculate cubic feet of air space to determine the number of strips required for treatment. Place strips so as not to impede air circulation. When multiple strips are required, distribute them uniformly over the treated space.

In (Garbage Cans) (Trash Dumpsters) (Trash Bins) (and) (Mobile Garbage Bins):

For the control of flies, attach the strip inside the can or dumpster and keep the lid closed. (Attach with enclosed cable tie to the hinges of the garbage container.) (Attach enclosed clip to the garbage container lid and insert strip.) (Attach enclosed clip, which contains the strip, to the garbage container lid.) (For superior adhesion clean surface of all residues before applying the clip.)

In Animal Buildings:

This product controls flies, mosquitoes and gnats in horse barns, calf parlors, hog parlors, stables, poultry houses, tack rooms and dog kennels. Do NOT contaminate food, water, foodstuffs, milk or milking equipment.

In Milk Rooms:

This product controls flies, mosquitoes and gnats in milk rooms and bulk storage rooms. Do NOT contaminate milk or milking equipment.

In Agricultural Commodities:

For the bulk storage of raw grains such as corn, soybeans, cocoa beans and peanuts. This product controls stored product insects including (almond moths) (cocoa moths) (Indian meal moths) (and) (Mediterranean flour moths) infesting non-perishable bulk-stored raw agricultural commodities. Calculate the cubic feet of air space above the commodity to determine the number of strips required for treatment. Treat in early spring before moths begin to emerge. Replace strips when needed to prevent egg laying by moths. Hang strips so as not to impede air circulation. When multiple strips are required, distribute them uniformly over the treated space.

In Catch Basins:

To control mosquitoes breeding in catch basins, suspend one strip about ten inches above the water level. Usual control lasts 10 to 15 weeks.

In Enclosed Utility Boxes:

This product controls fire ants, wasps and other insects as listed which commonly infest utility enclosures, cabinets, conduits, junction boxes, enclosed electrical panels, motor control rooms and other utility equipment for communications, electric, gas, water and cable television. Place product so that air can contact all sides of the strip. Record installation date and replace when effectiveness diminishes.

In Reptile Houses and Terrariums:

This product controls mites on reptiles. In reptile houses, hang the appropriate number of strips for the space to be treated. Do not over-treat. In terrariums, cover the top of an open terrarium having a minimum size of 10 cu. ft. with a wire screen and place the strip on the screen for 48 hours. Make sure that the reptiles cannot touch or contact the strip. Remove the strip after the treatment interval.

For Use as a Fly Killer:

Kills flies and other insects as listed for up to four (4) months. Remove from sealed bag and hang or stand, out of reach of children and pets, in an open space of an enclosed area, away from windows. One [5.25 or 10.5 or 16] g strip will treat [25-50 or 50-100 or 100-200] cu. ft. which is about equal to a space of [8' x 3' x 2' or 8' x 6' x 2' or 8' x 8' x 3'] for up to four (4) months. In a larger space if more than one strip is required, keep them at least 10 feet apart.

{NOTE TO REVIEWER: The use of the following chart is optional.}

How much space will one strip treat?		
Strip Size	Treats	Approximately Equivalent to Area Measuring
[5.25 or 10.5 or 16] grams	[25 to 50 or 50 to 100 or 100 to 200] cu.ft.	[4' x 3' x 2' = 24 or 8' x 3' x 2' = 48 or 8' x 6' x 2' = 96 or 8' x 8' x 3' = 192] cu. ft.
Always use the appropriate size and number of strips for the space being treated. If more than one is required, distribute them over the space equally.		

STORAGE AND DISPOSAL

Storage: Do not contaminate water, food or feed by storage or disposal. Do not open or remove from package before ready to install. Store in a cool, dry place.

Foil Pouch

Do not open or remove from package before ready to use. **Disposal: If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Outer Container

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or dispose of the empty container in trash.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

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AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

{NOTE TO REVIEWER: The following alternate warranty statement may be used.}

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

GUARANTEED RESULTS OR YOUR MONEY BACK

If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.

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{NOTE TO REVIEWER: The following statement is optional for use in California.} **Proposition 65:**

Warning: This product contains a chemical known to the State of California to cause cancer.